



Iowa Department of Education

Equity Site Visit Training for Districts, Schools, and Team Members for 2014- 2015

PURPOSE OF THE SITE VISIT

The Site Visit Process is set forth in the Code of Iowa 256.11(10) and Iowa Administrative code (Rules) 12.8(4)(a)(2)

- To assess progress with the C-PLAN
- To make recommendations with regard to the visit findings for the purpose of improving educational practices
- To determine that a school or school district is in compliance with the accreditation standards
- To provide a general assessment of educational practices

281—IAC 12.8(4)(a)(2)

Purpose of the Equity Review



1. Office for Civil Rights Compliance
2. Recommendations
3. Inclusive environments
4. School Improvement

Federal Areas/Equity Citations

- Title IX of the Education Amendments of 1972 (gender equity)
- Title VI Civil Rights Act of 1964 (race and national origin equity)
- Section 504 of the Rehabilitation Act of 1973 and Title II – Americans with Disabilities of 1990 (disability equity)
- Office for Civil Rights Guidelines of 1979 (equity in vocational programs)

Civil Rights Monitoring Process

Office for Civil Rights of the U.S. Department of Education requires state education agencies to develop “Methods of Administration” to reasonably assure that sub-recipients of federal financial assistance are in compliance with federal civil rights laws and to correct areas of non-compliance.

Methods of Administration

Methods of administration are to include:

- State policy reviews
- Desk audits of sub-recipient's enrollment and staffing data as well as other equity data
- On-site reviews of local education agencies to assess their degree of compliance
- Technical assistance on equity issues
- Biennial program reports to the United States Office for Civil Rights

School Improvement and Equity

- Equity components are incorporated into all school improvement visits
- Blending of two monitoring processes to be as seamless as possible for the district, while maintaining the Department's responsibility to ensure that educational agencies are adhering to civil rights and equity legislation
- Document review, site visit schedule, and interview groups are coordinated

Selection Criteria

- Course enrollment data in career and technical programs disaggregated by gender, disability and race
- Changing demographics
- Complaints or referrals
- Time elapsed since last equity review

On-Site Review

- Notification in concert with the School Improvement/Accreditation Visit
- Equity Visit Orientation for Districts
- Duration of Site Visit: 3 – 5 days
- Members of the Review Team: 6-15 members, including 3-6 equity team members

Pre-Visit Preparation

- Prepare Documents for Review
- Determine a Schedule
- Create an Opening Presentation



Document Review

- The Document Review Checklist provides guidance about documents which will be reviewed during the site visit process.
- Items listed on the Document Review Checklist lists are those documents needed to validate state and federal requirements.

Equity Document Review Checklist

- Document Review Checklist includes Equity Related Document Review Checklist

Equity Data Table

- Data not available from any other source
- Excel spreadsheet to be completed by district at least two weeks prior to the visit

Document Review

- Most documents will be submitted electronically prior to the visit.

<https://www.educateiowa.gov/pk-12/accreditation-program-approval/school-improvement>





- Google sites have been prepared for document uploads, or the district/school may work with the consultant if other electronic options are preferred.

- Additional documents from state and federal programs might be requested onsite if the team needs additional information.
- The onsite document review extends the desk audits and includes information from required reporting sources such as C-Plan and BEDS.
- Quality of documentation can be addressed as a strength or recommendation in the site visit report.



Equity Google Site

- Dedicated Google site for documents for the 2014 – 2015 site visit season. Links for individual district/school Google document sites will be available on the Equity Consultant's Google site.

Site Visit Schedule

- Work with School Improvement Consultant and Equity Consultant to determine time frame
- Create schedule including all required interview groups
- Determine locations for interviews
- Allow time for any remaining document review, travel, and team member conversations

Required Interview Groups

All required groups from School Improvement, plus additional:

- Equity Coordinator(s)
- Middle and High School Counselors
- Secondary English As A Second Language Teacher(s)
- Human Resources Coordinator
- Physical Facilities Staff

OVERVIEW PRESENTATION

The district/school will prepare a presentation for the visiting team to be shared early in the visit. This is the team's introduction to the district/school... the anticipatory set.

Using the 7 Themes of Improving Schools as areas of focus, this presentation will provide information about progress toward continuous improvement since the last visit.



Interview Groups

Strive to have each interview group represent the demographics of the district, including:

- **Balanced representation of gender**
- **Diverse racial/ethnic backgrounds**
- **Varying student academic abilities/needs**
- **Diverse family situations**

Keep in Mind

All Voices Matter

- **Avoid scheduling individuals for more than one interview without consultation with the site visit team leader.**
- **Limit the number of interviewees who are children of teachers, administrators, school board members, or other district/school employees.**
- **The schedule should include time after each interview for team members' discussion.**

A well-designed schedule is worth it!

Schedule

The last day should include a block of time for consensus building and report writing.

The visit will end with an exit interview sharing strengths and suggestions.

Keep in mind

We're All In This Together!

On-Site Manual



Contains information needed to determine compliance with federal and state civil rights laws

Team will complete before and during the visit through document review and interviews

Provided as a guide to the district not as a requirement to complete

Table of Contents

Eight Sections of Equity On-Site Manual:

- Administrative Requirements;
- Recruitment, Admissions and Counseling;
- Accessibility;
- Comparable Facilities;
- Services for Students with Disabilities;
- Financial Assistance;
- Work-study, Cooperative Programs, and Job Placements; and
- Employment

I. Administrative Requirements

Nondiscrimination Policies

Designation of Equity Coordinator

Grievance Procedures

Nondiscrimination Notification

Harassment, Bullying and Hazing Policies and Procedures

2014-2015 Protected Classes Chart

Nondiscrimination for protected classes

Program and Employment

Anti-Bullying and Harassment

Annual Notice to All Community Members

Continuous Notice in Major Publications

Role and Function of Equity Coordinator

- Knowledge of Federal and State Civil Rights Laws
- Board Policies and Administrative Procedures
- Dissemination of Information (Notification)
- Facilitating the Grievance Process
- Professional Development
- Documentation and Record Keeping
- Monitoring and Analysis of Disaggregated Data
- Monitoring Diversity on Advisory Committees

II. Recruitment, Admissions and Counseling

- A summary of attendance center and course enrollment data, disaggregated by gender, racial/ethnic background, and disability.
- A description of how these data are collected and used, with what frequency, by whom, and for what purposes.
- Evidence that staff members are taking steps to recruit students who have been under-represented.

EdInsight Equity Report

- Purpose is to examine student, employment and course data
- Student and course data disaggregated by gender, race, special education, 504 plan, ELL status and socio-economic status (SES)
- Employment data by gender and race
- Originate from multiple sources
- Available from 2009-2010 forward
- Each district has a trained staff person
- AEA can provide training

III. Accessibility for Students with Disabilities

Section 504 and Title II of the Americans with Disabilities Act requires district to provided access to buildings and/or programs to students and staff with disabilities. More detail provided later in the presentation.

IV. Comparable Facilities

- Districts must provide changing rooms, showers, and other facilities for students of one sex that are comparable to those provided to students of the other sex and facilities for students with disabilities comparable to students without disabilities.

V. Services for Students with Disabilities

- Least Restrictive Environment
- Access to CTE Courses
- Section 504 Procedures and Accommodations
- Students receiving special education services generally reflect the district population in terms of gender, race and national origin

VI. Financial Assistance

Districts may not award financial assistance in the form of loans, grants, scholarships, special funds, subsidies, compensation for work, or prizes to CTE students on the basis of race, color, national origin, sex or disability, except to overcome the effects of past discrimination.

VII. Work Study, Cooperative Programs, and Job Placement

Students enrolled in workplace learning programs reflect the demographics of the district on the basis of race, color, national origin sex and disability.

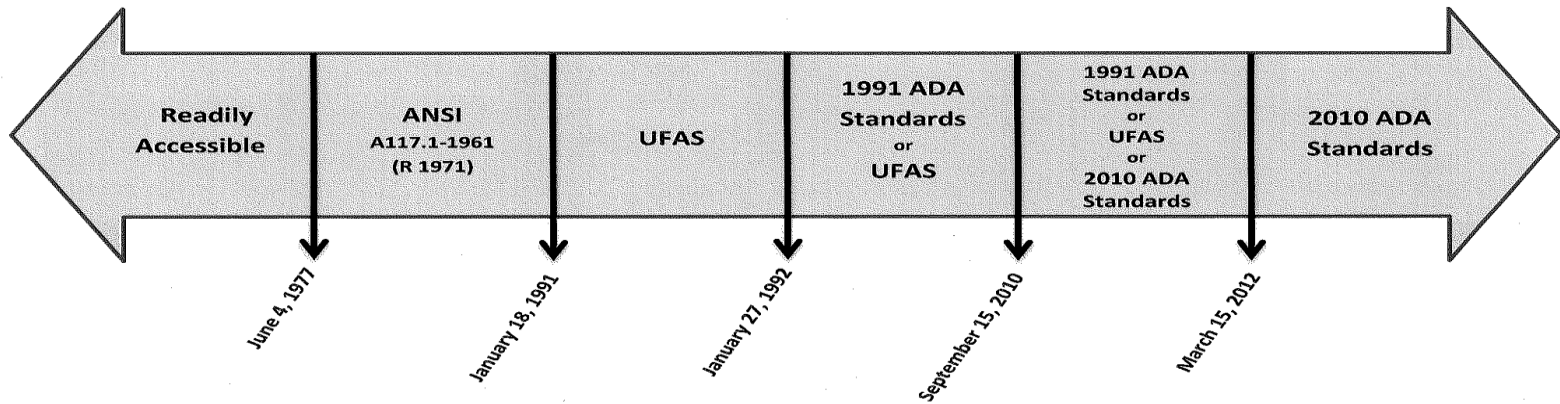
Employers do not discriminate on these bases.

VIII. Employment

- Nondiscrimination Policies and Notifications
- Recruitment Practices
- Relevant Labor Market
- Salary Policies
- Employment Opportunities for Persons with Disabilities
- Recruitment, Hiring and Assignment of Faculty

Building Accessibility Tour

- Buildings to be Reviewed: High School(s) and Middle School(s) with career and technical education programs and District Central Office
- Submit the list of buildings in the 2014-2015 Educational Equity Review Table
- District will complete the ADA checklist
- The Facilities Staff and the DE consultant will tour the facilities



Accessibility Standards

Important to use the correct standards for when the building/addition/renovation was constructed

Accessibility Standards by Date

STANDARD	DATES
Readily Accessible (Existing Facilities)	Prior to June 4, 1977
American National Standards Institute (ANSI) A117.1-1961 (R 1971)	June 4, 1977 to January 17, 1991
Uniform Federal Accessibility Standards (UFAS)	January 18, 1991 to January 26, 1992
1991 Title II Americans with Disabilities Act (ADA) or UFAS (district identifies)	January 27, 1992 to September 14, 2010
1991 ADA or UFAS or 2010 ADA (district identifies)	September 15, 2010 to March 14, 2012
2010 ADA	March 15, 2012

Existing Facilities

- » ■ U.S. Dept of Education, Office for Civil Rights (OCR) considers facilities constructed prior to June 4, 1977 as existing facilities.
- Facilities constructed after June 4, 1977 are considered new construction.

Title II of the ADA-Nondiscrimination on the Basis of Disability by Public Entities

- Prohibits **all** public entities – even those independent from federal funding – from discriminating against people with disabilities.
- USDE Office for Civil Rights (OCR) enforces Title II in public elementary and secondary education, higher education, and vocational education.
- People with disabilities are assured of access to **all** programs and services provided by state and local government agencies.

Program Accessibility

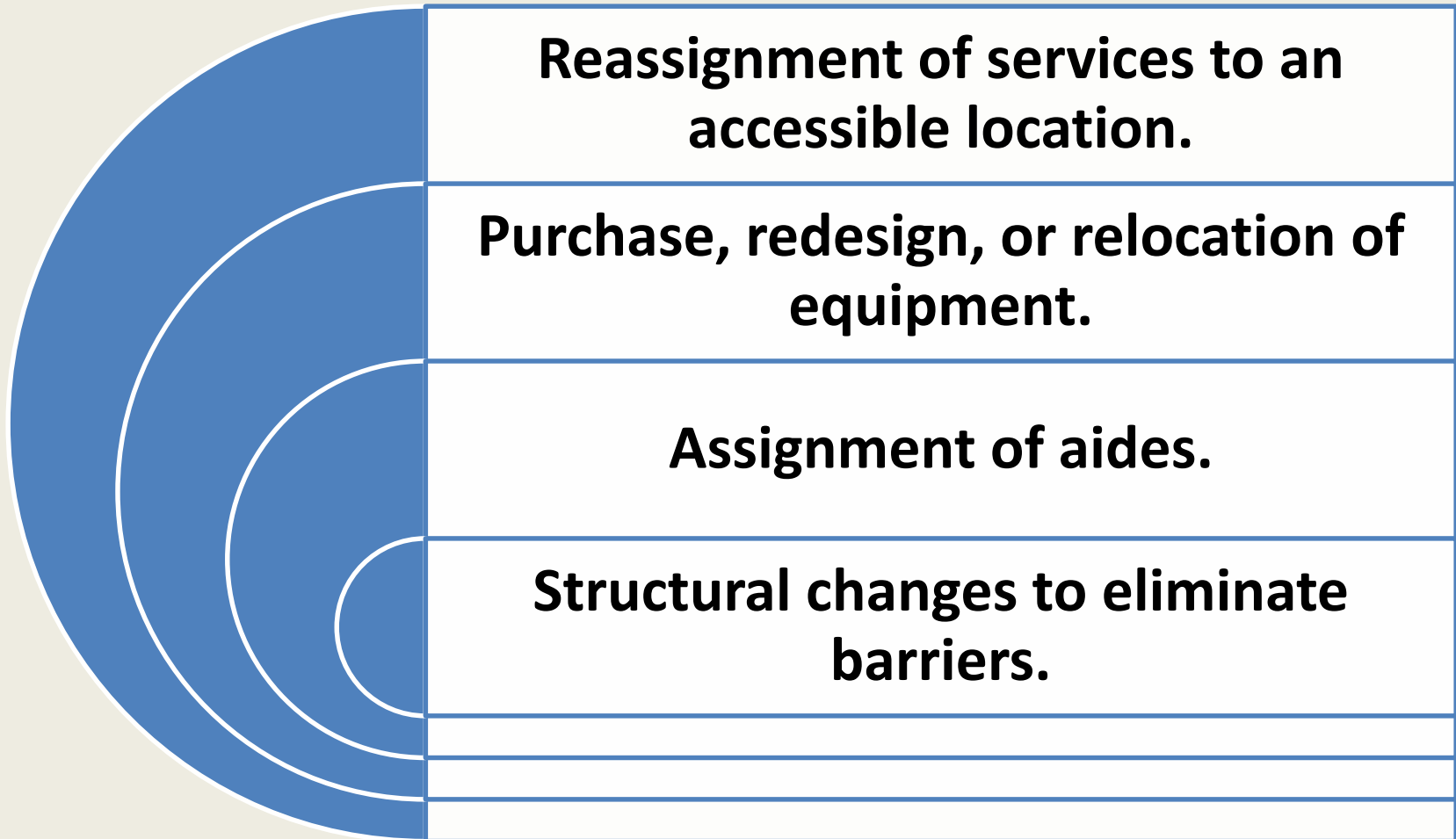
Public school systems must ensure that programs, services, and activities are accessible to and usable by individuals with disabilities.

Both Title II of the ADA and Section 504 prohibit school systems from denying people with disabilities equal opportunity to participate in programs, services, and activities because their facilities are inaccessible to, or unusable by, them.

Program Accessibility

- School districts do not have to make all classroom buildings accessible to students with disabilities.
- Programs in inaccessible classroom buildings must also be available in other accessible schools in the district.
- Accessible schools must be comparable in convenience to those available to students without disabilities.
- Both structural and nonstructural methods of achieving program accessibility are acceptable.

Methods of Compliance



New or Altered Facilities

- New construction and alterations require focus on providing physical access to buildings and facilities *rather* than on providing access to programs and services.

Transition Plans

- School systems must develop a transition plan that documents identified structural barriers and how they will be removed.
 - List physical barriers in facilities that limit accessibility to programs, activities, or services.
 - Describe methods to remove barriers to make facilities accessible.
 - Develop schedule and timeline to achieve Title II compliance – if longer than one year, identify interim steps for each year.
 - Identify official responsible for plan's implementation

FACILITY CHECKLIST for Equity Site Visits

- Parking
- Passenger Loading Zones
- Exterior Route of Travel
- Ramps
- Stairs
- Lifts
- Entrances
- Elevators
- Rooms and Spaces
- Restrooms
- Shower Rooms
- Assembly Areas
- Cafeterias
- Libraries
- Lobbies and Corridors



Resources

U.S. Department of Justice

www.ada.gov

- The U.S. Department of Justice website at: www.ada.gov site provides copies of the Title II regulations
- http://www.ada.gov/regs2010/titleII_2010/titleII_2010_fr.pdf (As published in Federal Register with Appendix)
- http://www.ada.gov/regs2010/titleII_2010/titleII_2010_withbold.htm (Regulations with bolded, integrated text)



U.S. Access Board

(800) 872-2253 (voice)

(800) 993-2822 (TTY)

E-mail: ta@access-board.gov

www.access-board.gov

Office for Civil Rights (OCR)



- The OCR office for Iowa is located at:
- Chicago Office
Office for Civil Rights
U.S. Department of Education
Citigroup Center
500 W. Madison Street, Suite 1475
Chicago, IL 60661
- Telephone: 312-730-1560
FAX: 312-730-1576; TDD: 877-521-2172
Email: OCR.Chicago@ed.gov
- The OCR National Headquarters is located at:
- U.S. Department of Education
Office for Civil Rights
Lyndon Baines Johnson
Department of Education Bldg
400 Maryland Avenue, SW
Washington, DC 20202-1100
- Telephone: 800-421-3481
FAX: 202-453-6012; TDD: 877-521-2172
Email: OCR@ed.gov

Iowa

National Headquarters

Letter of Findings Equity Report Format

Eight Sections of Equity On-Site Manual:

- Administrative Requirements;
- Recruitment, Admissions and Counseling;
- Accessibility;
- Comparable Facilities;
- Services for Students with Disabilities;
- Financial Assistance;
- Work-study, Cooperative Programs, and Job Placements; and
- Employment

Letter of Findings/Equity Report

- Strength Statements
- Recommendations for Improvement
- Noncompliance issues

Seven Characteristics of Improving Schools

- Vision, Mission, and Goals
- Leadership
- Collaborative Relationships
- Learning Environment
- Curriculum and Instruction
- Professional Development
- Monitoring and Accountability

Voluntary Compliance Plan

The LEA will develop a voluntary compliance plan (VCP) addressing any non-compliance issues and send the plan to the DE within 60 calendar days of the date of the Letter of Finding

The Equity Consultant will notify the LEA if revisions to the plan are needed and will approve the final plan

Plan Components

- Noncompliances will be provided in the Letter of Finding in the sample format in Appendix A
- VCP must contain the statement of noncompliance; district action plan to remedy each of the areas of noncompliance; the evidence of correction that will be submitted; the staff person(s) responsible for each action; and a reasonable projected timeline for completing the action, including the month and year. The plan must be signed and dated by superintendent.

Monitoring and Follow Up

- Documentation of evidence of remedies will be submitted to the equity consultant
- A follow up visit to monitor completion of all items, including accessibility, will occur about a year after the visit
- After successful completion of all noncompliance items, the district's equity file will be closed

Consequences of Continued Noncompliance

- In the event a district does not submit a voluntary compliance plan, or does not show good faith effort to complete its voluntary compliance plan, the State Director, on behalf of the State Board, will take one of the following actions:
- Notify the U.S. Department of Education Office for Civil Rights
- Notify the Iowa Civil Rights Commission or the Attorney General's Office
- Inform the school accreditation process

Close Equity File

- When all noncompliance items in the VCP are satisfactorily completed, the equity file will be closed at the DE and the district will be notified.
- However, the Office for Civil Rights can re-open files at any time.

Iowa Department of Education Website

Equity Education Link on the Website:

<https://www.educateiowa.gov/pk-12/accreditation-program-approval/equity-education>

Contact

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QUESTIONS?

Site Visit Training